



Legal Aid Society

Pursuing Justice • Restoring Hope

425 W. Muhammad Ali Blvd. Louisville, Kentucky 40202 www.laslou.org
Phone (502)584-1254 Toll Free (800)292-1862 Fax (502)584-8014

Dennis E. Bricking
Executive Director

Jeffrey A. Been
Associate Director

Stefanie A. Coomes
Information Systems Manager

Carolyn A. Dean
Controller

Barbara Ward Dicken
Director of Development

Patricia A. Kennedy
Human Resources Director

Robert H. Littlefield
Managing Attorney
Rural Division

Douglas M. Magee
Volunteer Lawyer Program
Director

Ronald Marstin
Managing Attorney
Urban Division

Attorneys

Gretchen C. Avery
Mary P. Cartwright
Tracy B. Cecil

Kristen Dunaway
Lea D. Hardwick
Lisa Kilkelly
S. Stewart Pope

Derek Preston
Jeffrey B. Segal

Robert Frederick Smith
Barbara A. Sullivan
Amy Karn Turner
Rita J. Ward
John Young

Paralegals

Tiffany J. Bowman
Robbie D. Brice
Carol Dupin

Catherine M. Ford
Margaret J. Hostetter
Shelley K. Krininger

Ferne McCauley
Susan L. Metcalf
L. Marie Tull
Alberta H. White

February 2, 2004

VIA EXPRESS MAIL

Mr. Thomas M. Dorman, Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602-0615

**RE: In The Matter Of:
AN ADJUSTMENT OF THE GAS AND ELECTRIC RATES TERMS
AND CONDITIONS OF LOUISVILLE GAS AND ELECTRIC
COMPANY, CASE NO. 2003-00433**

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case are the original and eight (8) copies of the First Data Request of Metro Human Needs Alliance Inc. and People Organized and Working for Energy Reform to Louisville Gas and Electric Company.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance. Please contact me if you have any questions or need further information regarding this matter.

Very truly yours,

Lisa Kilkelly

LK
Enclosures

cc: Parties of Record

RECEIVED

FEB 03 2004

PUBLIC SERVICE
COMMISSION



RECEIVED

FEB 03 2004

PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of:

**AN ADJUSTMENT OF THE GAS AND ELECTRIC)
RATES, TERMS AND CONDITIONS OF) CASE NO.
LOUISVILLE GAS AND ELECTRIC COMPANY) 2003-00433**

**FIRST DATA REQUEST OF METRO HUMAN NEEDS ALLIANCE (MHNA)
AND PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM
(POWER) TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Come Metro Human Needs Alliance ("MHNA") and People Organized and Working for Energy Reform ("POWER"), by counsel, and request the response of Louisville Gas and Electric Company ("LG&E") to the following Requests for Information.

GENERAL INSTRUCTIONS

As used herein "documents" refers to every writing or written record of every description that is, or has been in the possession, control or custody of LG&E or its agents or of which LG&E has knowledge including without limitation, correspondence, books, journals, memoranda, notes, studies, pamphlets, maps, drawings, pictures, recordings video tapes, reports, surveys, statistical computations, financial records, computer or electronic data or any copy of such writing or such record when the original is not in the possession, custody or control of LG&E or its agents and every such record where such copy is not an identical copy of the original.

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) These requests shall be deemed continuing so as to require supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing hereon.
- (3) If any request appears confusing, please request clarification directly from the undersigned.
- (4) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(6) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.

(8) In the event any document called for has been destroyed or transferred, please provide identification of the document and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(9) To the extent that a request calls for information not available for all categories or all periods of time, please explain why the information is not available and answer the request for the months or categories for which it is available.

REQUESTS FOR INFORMATION

1. At Volume 1, Tab 24 of its Application, LG&E states that the average monthly bill, for each customer rate class to which the proposed rate change applies will increase/decrease as follows:

Electric residential: \$6.54 12.3%

Gas residential RGS: \$5.00 7.6%

Please explain how the above dollar amounts and percentages were reached, including all assumptions, data and calculations utilized.

2. At page 6 of the Testimony of Mr. Staffieri, he states "The monthly residential electric bill will increase by 10.70% or approximately \$6.00 for a customer using 1000 Kwh of electricity. The monthly residential gas bill will increase by 6.50% or approximately \$5.50 for a customer using 90 Ccf of gas."

a) Please explain how the above dollar amounts and percentages were reached, including all assumptions, data and calculations utilized.

b) Please explain why Mr. Staffieri utilized the amounts 1000Kwh and 90 Ccf for his example above.

- c) Please explain the reason for the discrepancy between the percentage increases for residential gas and electric customers reported by Mr. Staffieri in his testimony above and those reported at Volume 1, Tab 24 of the Application referred to in Data Request Number 1 above.
3. For each month beginning with January 1, 2001 through January 31, 2004, state the average gas usage per customer and the average gas bill per customer for the following categories of residential customers. If the information requested is not available for all categories or all months, please explain why the information is not available and answer the request for the months or categories for which it is available.
- a) All residential customers
- b) All residential customers receiving LIHEAP funds during that year. (For example, for 2001 state the average usages and bills for those who received LIHEAP during 2001, for 2002 state the average usages and bills for those who received LIHEAP during 2002 and so on.)
4. For each month beginning with January 1, 2001 through January 31, 2004, state the average electric usage per customer and the average electric bill per customer for the following categories of residential customers. If the information requested is not available for all categories or all months, please explain why the information is not available and answer the request for the months or categories for which it is available.
- a) All residential customers
- b) All residential customers receiving LIHEAP funds during that year. (For example, for 2001 state the average usages and bills for those who received LIHEAP during 2001, for 2002 state the average usages and bills for those who received LIHEAP during 2002, and so on.)
5. For each year from 2001 through 2003, state the annual number of customers in each category specified in questions 3 and 4 above.
6. a) Did LG&E in any way consider the impact of the changes proposed in its filings in this case on its low-income customers, however LG&E defines them? If so, please describe these considerations including the names and positions of persons involved and summarize the conclusions reached.
- b) Please identify and provide copies of any documents discussing or evaluating the impact of the proposed rate increase on low income customers, such as studies, reports, data, or memoranda.
7. Please explain the rationale for changing the term "Prompt Payment Provision" to "Late Payment Charge" throughout the gas and electric tariffs (see e.g. Current Electric

Tariff Third Revision of Original Sheet No. 2, compared to Proposed Electric Tariff Original Sheet No. 5) and provide copies of any documents discussing this change.

8. Mr. Seelye, at page 68-69 of his testimony discusses generally how the proposed prepaid meter charge of \$0.05518/kWh was derived. Please explain specifically how this charge was derived, including all assumptions, data and calculations utilized.
9. Please answer the following questions with reference to the proposed change in the disconnect/reconnect charge from \$18.50 to \$23.
 - a) Identify by name and position the persons involved in the decision to make this change and describe their involvement. If any persons involved are not LG&E employees, please state the employer and business address of such persons.
 - b) State the monthly revenue generated by the disconnect/reconnect charge for each month beginning January 1, 2001 through January 31, 2004.
 - c) State the monthly expenses generated by the disconnections and reconnections to which the charge applies for each month beginning January 1, 2001 through January 31, 2004.
 - d) Identify how the disconnect/reconnect revenue and expense items are described or categorized in LG&E's income and expense information.
 - e) If the Commission approves LG&E's proposal to increase the disconnect/reconnect charge, please describe the anticipated effect in revenue and expense on a monthly and annual basis.
 - f) Please describe all previous changes in this charge by date and amount of change and identify the Commission case or filing in which the change was approved.
 - g) Please provide copies of all background information, data and work papers used and relied upon by Mr. Cockerill in preparation of SLC Exhibit 1.
 - h) Please provide the number of disconnects and reconnects for each month starting January 1, 2001 through January 31, 2004 to which LG&E charged a disconnection/reconnection fee.
 - i) Please break down the numbers of disconnects and reconnects for the above months provided above in response to Request number 9h by zip code of the location where the disconnect or reconnect occurred.
 - j) Please provide the number of disconnects and reconnects for each month starting January 1, 2001 through January 31, 2004 for customers who received LIHEAP during that year.

10. Please answer the following questions with reference to the proposed \$69 charge for meter testing.

a) Please provide copies of all background information, data and work papers used and relied upon by Mr. Cockerell in preparation of SLC Exhibits 2 and 3.

b) Please provide the total number of residential meter tests performed for each month starting January 1, 2001 through January 31, 2004, separately identifying gas meter tests and electric meter tests.

c) Break down the total number of meter tests provided above for the period specified above by zip code of the location of the meter.

d) Provide the number of meter tests for the period specified above which showed that the meter tested was no more than two percent fast.

e) For each month specified above, identify how many tests were performed by LG&E employees and how many by contractors. For LG&E employees, please identify the employee's position and average time spent on the test. For contractors identify the average cost per test.

f) Identify by name and position the persons involved in the decision to make this change and describe their involvement. If any persons involved are not LG&E employees, please state their employer and business address.

g) State the monthly expenses generated by the meter tests for each month beginning January 1, 2001 through January 31, 2004.

h) Identify how these expense items are described or categorized in LG&E's income and expense information.

i) If the Commission approves LG&E's proposal to increase the meter test charge, please describe the anticipated effect in revenue and expense on a monthly and annual basis.

11. Please answer the following requests concerning proposed changes in the residential deposits.

a) Identify by name and position the persons involved in the decision to make this change and describe their involvement. If any persons involved are not LG&E employees, please state the employer name and business address of such persons.

b) State the monthly revenue generated by the deposits for each month beginning January 1, 2001 through January 31, 2004.

c) Identify how the deposit revenue is described or categorized in LG&E's financial information.

- d) If the Commission approves LG&E's proposal regarding deposits, please describe the anticipated increase in deposit revenue on a monthly and annual basis.
- e) For each month beginning January 1, 2001 through January 31, 2004, state the number of new accounts opened and the number of these for which LG&E required a deposit.
- f) For each month beginning January 1, 2001 through January 31, 2004 state the average amount of deposit required.
- g) With reference to the tariff language at Original Sheet No.87 (electric) and Original Sheet No. 86 (gas) stating LG&E may offer the option of paying deposit in installments, please provide a complete explanation for the addition of this language and copies of any documents discussing the addition of this language.
- h) Identify and provide copies of all policies, guidelines and other documents relating to LG&E's decision as to whether to allow a customer to pay a deposit in installments.
- i) Identify and provide copies of all policies, guidelines and other documents relating to LG&E's decision as to whether to require a customer to pay a deposit.
12. Please describe all changes LG&E is proposing to the budget billing program. Please explain the rationale for LG&E harmonizing with KU's plan rather than the other way around.
13. Identify the location of the language referred to by Mr. Cockerell at p.8 regarding verification of customer read information.
14. Please describe the location of new language to protect against theft of service referred to by Mr. Cockerill at page 8 of his testimony. Please describe all rationales for this change.
15. a) Please provide the number of residential customers who were charged at the General Services rate during 2001, 2002 and 2003.
- b) Please provide any information available regarding why these customers are charged at the General Services rate rather than the Residential rate.
16. a) If the Commission approves LG&E's Application, please state the amount and proportion of new revenue on an annual basis as a result of the new rates from each of the following classes of customers:

Residential

Commercial

Industrial

- b) If the new revenue from residential customers is greater than that from the other classes, please explain why.
17. Please answer the following questions regarding LG&E's call centers.
- a) Please identify the location of each call center by street address.
- b) Please describe the territory each call center serves and the number of customers each serves.
- c) Please state the number of employees for each call center.
- d) Please list the total expenses for each call center during the test period ending September 2003.
18. a) Please provide organizational charts, for LG&E and KU separately, showing the relationship of the following divisions: call centers, credit and collections and external communications giving the names and titles of vice presidents, supervisors, managers and the number and title of employees responsible to each supervisor and manager.
- b) List the expenses for each division separately, (call center, credit and collections, and external communications) for the test period.
- c) If the Commission approves LG&E's proposed changes in rates, terms and conditions as proposed, state the amount and proportion of new revenue will go to each of the call centers, credit and collections and external communications.
- d) For each of the divisions, call center, credit and collections and external communications, please describe any new initiatives planned for each division and the projected cost of each new initiative.
- e) For each division, describe by name, date and content all trainings for each division which took place during the test period. Please separately specify LG&E and KU. For each, please specify the name and position of the persons responsible for the training and the name and position of the persons conducting the trainings.
19. Please describe all developments in information systems and information technology relating to customer service and specifically including what improvements have been made to detail customer information, from January 1, 2003 to the present. Please provide the dates each development went into effect and the expenses for each.

20. Please provide a list of the names and addresses of the news media and publications in the LG&E territory, which LG&E used to announce its Application for rate increase
21. Please provide the percentage increase in the non-fuel bill for the average residential electric customer as a result of this proposal, and the calculation performed to produce this result.
22. Please provide the percentage increase in the non-gas cost bill for the average residential customer, and the calculation performed to produce this result.
23. Please provide the percentage increase/decrease in every tariff charge for each customer class that is proposed as part of this rate application.
24. Please provide a schedule that identifies the percentage increase in non-fuel revenues or non-gas cost revenues for each customer class as proposed in this application.
25. Please provide a schedule of total revenues, costs and net revenues from off-system sales for each of the following time periods
 - a. The test year;
 - b. The five preceding calendar years;
 - c. Calendar year 2003, if not included above – if not currently available, please provide when available;
 - d. Currently projected for calendar year 2004.
26.
 - a) Please provide any analysis, study or memorandum in LG&E's possession discussing the impact of this Application on the LG&E Prepaid meter program or its customers.
 - b) If no such document exists, please state whether LG&E believes that this Application will have any impact on participation in that program or performance of obligations by participants in that program;
 - c) If LG&E believes that there will be an impact, please describe in detail the impact that LG&E believes this Application will have if approved.
27. Please provide any existing analysis performed by LG&E or any existing memorandum that discusses the impact of increased customer charges on the stability of revenues for LG&E.
28. Please state the annual amount LG&E has contributed to Winterhelp for 2001 through 2003.
29. Please state the annual amount LG&E has contributed to Project Warm for 2001 through 2003

30. Please state the annual amount LG&E has contributed to WeCare for 2001 through 2003.
31. Please explain in detail LG&E's credit counseling program referred to by Mr. Cockerell at page 10 of his testimony.
32. Please explain in detail LG&E's policies on payment arrangements referred to by Mr. Cockerell at page 10 of his testimony.

Respectfully submitted,



LISA KILKELLY
LEGAL AID SOCIETY, INC.
425 West Muhammad Ali Blvd.
Louisville, Kentucky 40202
(502) 585-6980
Attorney for MHNA and POWER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Data Request of Metro Human Needs Alliance and People Organized and Working for Energy Reform was served on the following persons on the 2nd day of February, 2004, United States mail, postage prepaid.

Michael S. Beer
Vice President, Rates and Regulatory
LG&E Energy Corp.
220 West Main Street
Louisville Kentucky 40202

Kendrick R. Riggs
Allyson K. Sturgeon
Ogden Newell & Welch PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

Robert M. Watt, III
Stoll, Keenon & Park, LLP
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801

Linda S. Portasik
Senior Corporate Attorney
LG&E Energy Corp.
220 West Main Street
Louisville, Kentucky 40202

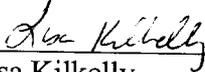
Elizabeth E. Blackford
Assistant Attorney General
Office of Rate Intervention
Office of the Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

Michael L. Kurtz
Boehm, Kurtz & Lowry
2110 URS Center
36 East Seventh Street
Cincinnati, Ohio 45202

David A. McCormick
General Attorney
U.S. Army Legal Services Agency
DAJA-RL 4118
901 N. Stuart Street, Room 713
Arlington, Virginia 22203-1837

David C. Brown
Stites & Harbison, PLLC
400 W. Market Street, Suite 1800
Louisville, Kentucky 40202

Joe F. Childers
201 West Short Street, Suite 310
Lexington, Kentucky 40507



Lisa Kilkelly
Legal Aid Society, Inc.
425 W. Muhammad Ali Blvd.
Louisville, Kentucky 40202

Attorney for MHNA and POWER